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April 26, 2023

VIA ECF

The Honorable Kenneth M. Karas
The Hon. Charles L. Briant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: ***Catherine Kassenoff v. Allan Kassenoff et al.***
Case No. 7:22-CV-002162-KMK (S.D.N.Y.)

Dear Judge Karas:

I write to follow up on Defendants' March 28, 2023 pre-motion conference letter seeking a conference in anticipation of filing a motion for sanctions under 28 U.S.C. § 1927 and the Court's inherent powers. (Dkt. 47). The following day, on March 29, 2023, the Court endorsed Defendants' letter, ordering the Plaintiff "to respond to [Defendants'] letter by 4/5/23." (Dkt. 48). Plaintiff has failed to respond and, thus, is in violation of the Court's Order.

Additionally, on April 5, 2023, I filed a follow-up letter requesting that (1) any pre-motion conference not take place on April 5-7 due to my observance of Passover and (2) that the deadline for filing Defendants' anticipated motion for sanctions be extended to 10 days after (and assuming that) the Court gives permission to file such a motion. (Dkt. 50). On April 6, the Court endorsed Defendants' letter as follows:

Granted. The Sanctions Motion deadline is extended 10 days after the Court gives permission for such a motion.

So Ordered.

(Dkt. 51). The Court, however, has not set a date for a pre-motion conference – likely because Plaintiff is in violation of the Court's Order to respond to Defendants' pre-motion conference letter by April 5, 2023. Accordingly, Defendants respectfully request that the Court waive the requirement for a pre-motion conference and grant them permission to file their motion. Alternatively, Defendants respectfully request that the Court set a pre-motion conference at its earliest convenience.

Thank you very much in advance.

Sincerely,

/s/ Allan Kassenoff

Allan Kassenoff